

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

JUN - 1 2010

OFFICE OF ECOSYSTEMS. TRIBAL AND PUBLIC AFFAIRS

Jeff Walter, Forest Supervisor Ochoco National Forest 3160 NE 3<sup>rd</sup> Street Prineville, Oregon 97754

Re: EPA Region 10 Review of the Canyon Fuels Vegetation Management Project FEIS

EPA Project Number: 09-072-AFS

Dear Mr. Walter:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) for the Canyon Fuels Vegetation Management Project (CEQ Number 20100155) on the Lookout Mountain Ranger District, Ochoco National Forest, Crook County, Oregon. Our review of the FEIS was conducted in accordance with our responsibilities under National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The FEIS identifies Alternative 3 as the preferred alternative. This alternative would seek to move forested vegetation toward the historic range of variability through commercial thinning, precommercial thinning, juniper removal, hardwood restoration, and fuels treatments. Alternative 3 (as analyzed in the FEIS) would harvest 4,193 acres, precommercial thin 5,949 acres, remove juniper on 1,397 acres, restore hardwoods on 236 acres, and conduct prescribed burning on 2,038 acres. Alternative 3 as modified under the Record of Decision would defer 93.9 acres of harvest and associated activities, 87.4 acres of precommercial thinning and underburning, and 0.14 miles of road construction.

In our comments on the draft EIS, EPA indicated support for the proposed management objectives, but raised questions about riparian harvest prescriptions, grazing management in riparian habitat conservation areas (RHCAs), and climate change impacts. We also requested that the Forest Service consider modifications to the prescriptions proposed for the Douthit Creek drainage. We appreciate the additional detail included in the FEIS to address these questions and recommendations. In particular, we appreciate the additional design element related to harvest within RHCAs, the robust discussion of climate change, and the modifications to Alternative 3 in the Record of Decision. The modifications to the preferred alternative should reduce runoff potential and reduce potential channelization, thereby addressing our concerns related to the sensitivity of the drainage. We remain supportive of the proposed management objectives, particularly as they relate to increasing the number of late and old structure stands, reducing the susceptibility of the landscape to large-scale infestations by insects and disease, enhancing hardwood communities and increasing riparian vegetation and large tree structure in Riparian Habitat Conservation Areas. We look forward to tracking the progress of this project as it moves forward.

We appreciate the opportunity to provide comments on the final EIS, and I encourage you to contact Teresa Kubo of my staff with any questions at, (503) 326-2859 or kubo.teresa@epa.gov.

Sincerely, Christin G. Leichell · Christine B. Reichgott, Manager

Environmental Review and Sediment Management Unit